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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC., et al.,

Plaintiffs,

v.

RIMINI STREET, INC., et al.,

Defendants.

Case No. 2:10-cv-00106-LRH-VCF

**RIMINI'S NOTICE REGARDING
 DOCUMENT PRODUCTION**

Hearing:

Date: September 20, 2021
 Time: 9:00 a.m.
 Place: Bruce R. Thompson
 Courthouse, Reno, NV
 Judge: Hon. Larry R. Hicks

1 TO THE COURT AND PLAINTIFFS' ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that today Rimini made a replacement production to Oracle
3 of data exported from Rimini's Salesforce database, which is a database Rimini uses to record
4 interactions with its support customers. Rimini made this production to correct a recently
5 discovered and inadvertent error in its October 2019 and January 2020 productions of
6 Salesforce data during the discovery period following the final judgment and conclusion of
7 *Rimini I*.

8 Rimini produced to Oracle in October 2019 and January 2020 certain tables and
9 accompanying data from its Salesforce database, including more than 42,900 documents. The
10 Salesforce production was supposed to include cases open between November 5, 2018 (the date
11 of the injunction) and the date of the export, for the PeopleSoft and J.D. Edwards product lines.

12 On Friday, April 30, 2021, however, Rimini detected a potential issue with respect to
13 its previous export of Salesforce data suggesting that not all intended data had been exported
14 and produced. Rimini immediately began investigating the matter and, although it did not have
15 full information, the next business day (Monday, May 3), Rimini notified Oracle of the issue
16 and Rimini's belief that an error in the Salesforce data export process had, in fact, occurred,
17 which resulted in not all responsive data being exported and produced to Oracle previously.
18 *See Exhibit A* (May 3, 2021 Email from E. Vandeveld). Rimini continued its investigation
19 and also immediately began working to re-export responsive Salesforce data in order to produce
20 it to Oracle as quickly as possible.

21 Based on Rimini's investigation to date, we believe an error occurred in the fall of 2019
22 in which an incorrect query of the Salesforce database was used to export the data. It appears
23 that the Salesforce production was under-inclusive in some respects (*i.e.*, it omitted certain
24 responsive cases) and over-inclusive in others (*e.g.*, it included cases pertaining to product lines
25 other than PeopleSoft and J.D. Edwards). Rimini's replacement production today corrects this
26 issue, and includes Salesforce data for all cases for the J.D. Edwards and PeopleSoft product
27 lines that were open at any time between November 5, 2018 (the date of the injunction) and
28 September 10, 2019 (the date of the prior Salesforce export), as previously intended.

1 Rimini regrets the error and informed Oracle today that it will work with Oracle on any
2 adjustments to the case schedule that it may necessitate. *See* Exhibit B (May 11, 2021 E.
3 Vandeveld Ltr. to J. Polito). Rimini proposed to meet and confer with Oracle on the issue
4 after Oracle has had time to conduct a preliminary analysis of the records. *Id.*

5
6 Dated: May 11, 2021

7 GIBSON, DUNN & CRUTCHER LLP

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9 By: /s/ Eric D. Vandeveld
Eric D. Vandeveld

10 *Attorneys for Defendant*
11 *Rimini Street, Inc.*
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